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Attorneys for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

SATA GMBH & CO. KG, a German corporation,

Plaintiff/Counterdefendant,

v.

ZHEJIANG RONGPENG AIR TOOLS CO.,
LTD dba AEROPRO, a foreign entity,

Defendant/Counterclaimant.

CASE NO. 2:18-cv-02088-GMN-EJY

**STIPULATION AND [PROPOSED]
ORDER TO STAY PROCEEDINGS
PENDING SETTLEMENT
NEGOTIATIONS**

[FIRST REQUEST]

Plaintiff/Counterdefendant SATA GmbH & Co. KG (“SATA”) and Defendant/
Counterclaimant Zhejiang Rongpeng Air Tools Co., LTD dba Aeropro (“Rongpeng,” together
“the Parties”) hereby respectfully submit this Stipulation and [Proposed] Order to Stay
Proceedings Pending Settlement Negotiations.

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1 The Parties represent and stipulate as follows:

2 1. The Parties are in the midst of productive settlement discussions to resolve this
3 matter. Given the complexities involved in communicating with two foreign parties and the
4 need for translation, the Parties request a 60-day stay of all proceedings in this case, through
5 October 29, 2019, in which to attempt to reach a mutually agreeable settlement.

6 2. Per the Court's Scheduling Order [ECF 39], the deadline to disclose experts is
7 rapidly approaching on September 20, 2019, 21 days from the date of this submission.
8 Additional deadlines in the Court's Scheduling Order will also run during the requested stayed
9 period.

10 3. In the event the Parties are unable to finalize settlement within the stayed period,
11 the Parties request that the Court automatically reinstitute all remaining deadlines in the Court's
12 Scheduling Order [ECF 39] after the expiration of the 60-day stay, with an additional 30-day
13 extension (for a total of 90 days), to wit:

- 14 a. Disclosures concerning experts, presently due on September 20, 2019,
15 shall be made by December 19, 2019.
- 16 b. Disclosures concerning rebuttal experts, presently due on October 21,
17 2019, shall be made by January 20, 2020.
- 18 c. The date for filing dispositive motions, presently due on December 19,
19 2019, shall be made by March 18, 2020.
- 20 d. The date for filing the joint pretrial order, presently due on January 20,
21 2020, shall be made by April 20, 2020.

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4. This Stipulation is made in good faith and not for purposes of delay.

DATED this 30th day of August 2019.

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DATED this 30th day of August 2019.

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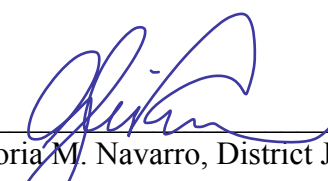
Attorneys for Defendant

ORDER

IT IS HEREBY ORDERED that the above Stipulation to Stay Proceedings Pending Settlement Negotiations, (ECF Nos. 43, 45), is **GRANTED**.

IT IS FURTHER ORDERED that pursuant to the parties' Stipulation, Plaintiff's Motion for Preliminary Injunction, (ECF No. 3), is **DENIED without prejudice** to the refiling of the Motion in the event settlement discussions are unsuccessful.

DATED this 9 day of September, 2019.



Gloria M. Navarro, District Judge
UNITED STATES DISTRICT COURT